DE/AFS/SF

15-Day Pre-Permit Construction Application, HMA

Gordon Paving Company

837 Madrona Street South
Twin Falls, ID 83301

April 21, 2008

TABLE OF CONTENTS

Gordon PAVING COMPANY, INC.

Asphalt Paving . Hot Mix . Seal-Coating
Crack Repair . Used Oil Disposal . Grading
Gravel Work . Striping . Bond Release Work

837 Madrona St S
Twin Falls, ID 83301
Phone: (208) 733-1800
Fax: (208) 733-1840

April 21, 2008

Idaho Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 N. Hilton St.
Boise, ID 83706-1255

Attn: Cheryl Robinson
Permit Writer
Air Quality Division

Dear Ms. Robinson,

In response to your letter dated April 17, 2008 that outlines DEQ's denial of our 15-Day Pre-Permit Construction Application (Project P-2008.0052), Gordon Paving Co., Inc. is submitting a revised application for DEQ consideration.

The attached application has been edited to correct inconsistencies and deficiencies as noted in your letter. In addition, a manufacturer's guarantee for emissions performance and a Form EU2 describing scalping screen specifications has been included.

Should you need any further information, please feel free to contact our representatives Dr. Saiid Dabestani or Robbie Hansen.

We appreciate your efforts towards a timely resolution of the permit application.

Sincerely,

Terry D. Straubhaar
Vice-President
Gordon Paving Co., Inc.

IDAHO
837 Madrona St S
Twin Falls, ID 83301
Phone: (208) 733-1800
Fax: (208) 733-1840

NEVADA
4780 W Harmon St., Suite 11
Las Vegas, NV 89103
Phone: (702) 227-7474
Fax: (702) 968-8074

UTAH
917 N 1400 W PO Box 996
St. George, UT 84771
Phone: (435) 656-0178
Fax: (435) 688-0979

"Licensed and Bonded Contractor for Over 50 Years"

Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline - 1-877-5PERMIT

15- Day Pre-Permit Construction Approval Application Completeness Checklist

This checklist is designed to aid the applicant in submitting a complete pre-permit construction approval application.

I. Actions Needed Before Submitting Application

☒ Refer to the Rule. Read the Pre-Permit Construction requirements contained in IDAPA 58.01.01.213, Rules for the Control of Air Pollution in Idaho.

☒ Refer to DEQ's Pre-Permit Construction Approval Guidance Document. DEQ has developed a guidance document to aid applicants in submitting a complete pre-permit construction approval application. The guidance document is located on DEQ's website (go to http://www.deq.idaho.gov/air/permits_forms/permitting/ptc_prepermit_guidance.pdf

☒ Consult with DEQ Representatives. Schedule a meeting with DEQ to discuss application requirements before submitting the pre-permit construction approval application. The meeting can be in person or on the phone. Contact DEQ's Air Quality Permit Coordinator at (208) 373-0502 to schedule the meeting. Refer to IDAPA 58.01.01.213.01b.

☒ Schedule Informational Meeting. Schedule an informational meeting before submitting the pre-permit construction approval application for the purposes of satisfying IDAPA 58.01.01.213.02.a. The purpose for the informational meeting is to provide information about the proposed project to the general public. Refer to IDAPA 58.01.01.213.01.c.

☒ Submit Ambient Air Quality Modeling Protocol. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the pre-permit construction approval application is submitted. Contact DEQ's Air Quality Modeling Coordinator at (208) 373-0502 for information about the protocol.

☒ Written DEQ Approved Protocol. Written DEQ approval of the modeling protocol must be received before the pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.213.01.c.

II. Application Content

Application content should be prepared using the checklist below. The checklist is based on the requirements contained in IDAPA 58.01.01.213 and DEQ's Pre-Permit Construction Approval Guidance Document.

☒ Pre-Permit Construction Eligibility and Proof of Eligibility. Pre-permit construction approval is available for minor sources and for minor modifications only. Emissions netting and emissions offsets are not allowed to be used. A certified proof of pre-permit construction eligibility must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.

☒ Request to Construct Before Obtaining a Permit to Construct. A letter requesting the ability to construct before obtaining the required permit to construct must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.c.

☒ Apply for a Permit to Construct. Submit a Permit to Construct application using forms available on DEQ's website at http://www.deq.idaho.gov/air/permits_forms/forms/ptc_general_application.pdf. Refer to IDAPA 58.01.01.213.01.a.

☒ Permit to Construct Application Fee. The permit to construct application fee must be submitted at the time the original pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.224.

☒ Notice of Informational Meeting. Within ten (10) days after the submittal of the pre-permit construction approval application, an information meeting must be held in at least one location in the region where the stationary source will be located. The information meeting must be made known by notice published at least ten (10) days before the information meeting in a newspaper of general circulation in the county in which the stationary source will be located. A copy of this notice, as published, must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.02.a.

☒ Process Description(s). The process or processes for which pre-permit construction approval is requested must be described in sufficient detail and clarity such that a member of the general public not familiar with air quality can clearly understand the proposed project. A process flow diagram is required for each process for which pre-permit construction approval is requested. Refer to IDAPA 58.01.01.213.01.c.

☒ Equipment List. All equipment that will be used for which pre-permit construction approval is requested must be described in detail. Such description includes, but is not limited to, manufacturer, model number or other descriptor, serial number, maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flowrate, stack gas temperature, etc. All equipment that will be used for which pre-permit construction approval is requested must be clearly labeled on the process flow diagram. Refer to IDAPA 58.01.01.213.01.c.

☒ Scaled Plot Plan. It is recommended that a scaled plot plan be included in the pre-permit construction approval application and must clearly label the location of each proposed process and the equipment that will be used in the process.

☒ Proposed Emissions Limits and Modeled Ambient Concentration for All Regulated Air Pollutants. All proposed emission limits and modeled ambient concentrations for all regulated air pollutants must demonstrate compliance with all applicable air quality rules and regulations. Regulated air pollutants include criteria air pollutants (PM_{10}, SO_x, NO_2, O_3, CO, lead), toxic air pollutants listed pursuant to IDAPA 58.01.01.585 and 586, and hazardous air pollutants listed pursuant to Section 112 of the 1990 Clean Air Act Amendments (go to http://www.epa.gov/ttn/atw/188polls.html). Describe in detail how the proposed emissions limits and modeled ambient concentrations demonstrate compliance with each applicable air quality rule and regulation. It is requested that emissions calculations, assumptions, and documentation be submitted with sufficient detail so DEQ can verify the validity of the emissions estimates. Refer to IDAPA 58.01.01.213.01.c.

☒ Restrictions on a Source's Potential to Emit. Any proposed restriction on a source's potential to emit such that permitted emissions will be either below major source levels or below a significant increase must be described in detail in the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.d.

☒ List all Applicable Air Quality Rules and Regulations. All applicable rules and regulations must be cited by the rule or regulation section/subpart that applies for each emissions unit. Refer to IDAPA 58.01.01.213.01.c.

☒ Certification of Pre-Permit Construction Approval Application. The pre-permit construction approval application must be signed by the Responsible Official and must contain a certification signed by the Responsible Official. The certification must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Refer to IDAPA 58.01.01.213.01.d and IDAPA 58.01.01.123.

☒ Submit the Pre-Construction Approval Application. Submit the pre-permit construction approval application to the following address:

Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 North Hilton
Boise, ID 83706-1255

1. Introduction & Purpose

Gordon Paving Company has been engaged in the asphalt paving, seal-coating, and sand & gravel business for many years with several locations in Idaho and other states. The company is in the process of constructing a new Asphalt plant in Twin Falls, Idaho. The purpose of this document is to request a 15-day pre-permit construction application in order to satisfy the requirements of IDAPA 58.01.01.213 Rules.

In order to facilitate this application process, IDEQ 15-day pre-permit construction checklist is used as guidance. Aspects of the checklist which do not require detailed descriptions are addressed below. Additional content of the application which require detailed descriptions (detail process, process flow diagram, emission inventory and modeling, etc.) are described in sections 2-6 of this document.

A) Pre-permit Construction Eligibility and Proof of Eligibility:

The proposed HMA is not a designated facility as defined in IDAPA 58.01.01.006.27 and not a major facility as defined in IDAPA 58.01.01.008.10 or 205. Therefore, this requirement is not applicable for the proposed facility.
Communication with IDEQ Air Permit Hot line on March 28, 2008, clarified and confirmed this item that the eligibility refers to the PSD (Prevention of Significant Deterioration, 40-CFR 52.21) and does not apply to the proposed facility.

B) Request to Construct Before Obtaining a Permit to Construct

The cover letter by the Gordon Paving, Inc. is provided.

C) Apply for a Permit to Construct

All the applicable IDEQ forms (PTC) are enclosed in Appendix (3) of this document.

D) Permit to Construct Application Fee

A check made to the State of Idaho, Fiscal Office in reference to the Air Quality Application Fee is enclosed.

E) Notice of Informational Meeting

An informational meeting notice is published in Times –News (main news paper in the Twin Falls County and the Magic Valley area) for April 11, 2008. A copy of this notice is enclosed in Appendix (4).

F) Scaled Plot Plant

A scaled plot plan is prepared by JUB engineering and is enclosed in Appendix (1) of this proposal.

G) Restrictions on a Source's Potential to Emit

IDAPA 58.01.01.213.01.d. rule is used to provide guidance for addressing this item. As cited earlier, the proposed facility is a minor facility (source) in which the criteria pollutant emission could exceed 110 T/Y without limits on the facility's potential to emit. It should also be pointed out that the facility is not a PSD major source because based on the emission inventory (Appendix (3)), the emissions do not exceed the PSD threshold of 250 T/Y. The applicant will comply with restrictions in accordance with Section 123 of the IDAP rules.

I) Certification of Pre-Permit Construction Approval Application

The IDEQ Form G-I is utilized to address this item. A responsible Official from Gordon Paving, Inc. has signed the form that should satisfy this part of the application. This form is included in Appendix (3) of this document.

J) Applicable Air Quality Rules & Regulations

In accordance with IDAPA 58.01.01.213 rules and communication with IDEQ- Air Quality staff, completed and certified HMAP form should satisfy this item of the checklist. This form is presented in Appendix (3) of this proposal.

As cited earlier, application items which require more detailed description are represented in the following sections. They are related to: Location of the Facility, Process Description, Equipment List, Emission Inventory, and Modeling.

2. Site (location) Description & Characteristics

The location of the HMA is at 1310 Addison Avenue West, Twin Falls, Idaho with the legal description of:
Township 10 South, Range 17 East, Boise Meridian, Twin Falls County, Idaho Section 7: A portion of the SE1/4 Sw1/4 more particularly described as follows: BEGINNING at the S1/4 corner of Section7; THENCE North 1° 15'51" East 280.4 feet along the easterly boundary of the SE1/4SW1/4 to the TRUE POINT OF BEGINNING ; THENCE North 1° 15'51" EAST 936 feet along said easterly boundary: THENCE North 88°57'18" West 791 feet; THENCE South 1° 15'51" West 936 feet; THENCE South 88°57'18" East 791 feet to the TRUE POINT OF BEGINNING.

The site and its vicinity are located within Twin Falls County and are zoned as industrial. The site is located north of State Highway 30 and west to southwest of Rock Creek Canyon. Currently the main portion of the subject property consists of land and a gravel pit which is used for the normal day to day business. The property is approximately 90 acres and seventeen acres of the property is planned for the new HMA plant.
The southern adjoining properties are farmland with residential quarters and are separated by Highway 30 from the subject property. The western adjoining properties are a mixture of residential and farmlands, some of which are separated by the 2700 Road from the site. Eastern adjoining property is the Idaho Sand & Gravel Company. The emission source of this adjoining property is located more than 1000 ft. from the proposed source.

The property is generally flat and gently slopes in a northeastern-eastern direction. The source of water is a private well which is located in the southern portion of the subject property between the office and the shop. The flow of the groundwater at the site appears consistent with the reported northeasterly regional groundwater flow. However, due to the existence of numerous private wells in the area as well as the influence of the canals, site-specific groundwater flow is likely to change throughout the seasons.

The US Soil Conservation Service has classified the dominant native surface soil within the boundary of the subject property as Portneuef. The texture of the soil is silt loam and has a moderate infiltration rate. The drainage of this type of soil is classified as well drained with intermediate water holding capacity. The Potneuef soil has high corrosion potential toward uncoated steel. The depth of the surface soil to the bedrock is more than sixty inches. The surface soil is followed by un-weathered bedrock and fractured Basalt. Appendix (1) of this document represents Vicinity Map, Property Map, and Building Locations.

3. Process Description

3.1General

The process of producing Hot Mix Asphalt (HMA) in the proposed plant is similar to other HMA plants. HMA paving materials are a mixture of well graded, high quality aggregate and/ or Recycled Asphalt Pavement (RAP) and liquid asphalt cement, which is heated and mixed in measured quantities to produce HMA. Aggregates and/ or RAP constitute over 92% of the total HMA mixture.

The process of producing HMA involves drying and heating the aggregate to prepare them for asphalt cement coating. In the drying process, the aggregate are dried in a rotating slightly inclined, direct-fired drum dryer. The aggregate is introduced into the higher end of the dryer. The interior of the dryer is equipped with flights that veil the aggregate through the hot exhaust as the dryer rotates. After drying, the aggregate is heated to a temperature from 275 to 325 degrees F and then coated with asphalt cement in one of two ways depending on the type of the plant. In most drum mix plants, the asphalt is introduced directly into the dryer chamber to coat aggregate. In batch mix plants, the mixing of aggregate and asphalt takes place in a separate mixing chamber called a pug mill. The variations in the HMA manufacturing process are primarily defined by the following types of plants: Batch Mix Plants; Parallel Flow Drum Mix Plants; and Counterflow Drum Mix Plants.

The proposed plant is a **portable** HMA which is categorized as a Counterflow drum mix plant. It is manufactured by ADM, Inc. and the specific model is known as Milemaker™ Series, Model MM225. The components of the plant includes: Cold Feed Bins, Dry Drum, Mixing Drum, Portable Silo, Drag Slat Conveyer, Recycled Conveyors, Portable Bag House, Recycled Asphalt Bins and Control Room.

3.2 Specific Process Description of the Proposed HMA:

This section of the proposal describes specific ways which the components of the plant are utilized in production of the asphalt. A summery of equipment list & operational parameters (maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flow rate, stack temperature and etc.) are tabulated in Table (3.1) following the step-by- step detailed process description.

3.3 Step-by-Step Process Description

The process of asphalt production in this plant consists of rock aggregates and hot liquid asphalt oil, blended together to achieve a uniform mixture. Aggregate material for hot mix asphalt varies in size from a fine sand to ¾" sized crushed rocks and is stockpiled near the asphalt plant according to size. Liquid asphalt oil, a byproduct of fuel refining, is stored adjacent to the facility in heated storage tanks.

The proposed HMA production is linear in nature and similar to a production line (Appendix (2), Figure 1). The process begins when blend percentages for aggregates and oil are entered into the process control computer located in the plant control room (Appendix (2), Figure 2). A front-end loader dumps aggregate into one of four separate cold feed bins (Appendix (2), Figure 3) according to material size. Under computer control, the contents of the bins are individually metered out onto a common conveyer belt that runs beneath all four bins. Blended aggregate travels up the weigh conveyor belt and empties into the drying drum—a horizontally rotating drum that contains mixing flights. Situated at the far end of the drying drum is a burner unit that produces a large flame. The combination of heat from the burner and mixing action of the rotating drum dries the aggregate and brings it up to proper mixing temperature (300-350° Fahrenheit). Opposite from the burner is a bag house (Appendix (2), Figure 4) that collects fumes from the dryer and filters out particulate matter by means of long cylindrical filters also known as bags.
Hot aggregate flows from the drying drum into a second and smaller rotating drum, the mixing drum (Appendix (2), Figure 4). Hot liquid asphalt oil is injected into the mixing drum where it combines with hot aggregate. Additionally, recycled asphalt product (RAP) can be introduced as an aggregate at this location in the process. Crushed RAP is dumped into the recycle bin (Appendix (2), Figure 5) by a front-end loader. RAP is metered out by computer control into the recycle lump breaker, which breaks chunks of RAP that may have conglomerated in the stockpile. RAP moves up an intermediate conveyer, which empties on to a weigh conveyor (Appendix (2), Figure 6) that empties into the top of the mixing drum. The rotating action of the mixing drum coats every surface of the aggregate with oil. The now finished hot mix asphalt is transferred from the end of the mixing drum via an enclosed and heated drag slat elevator (Appendix (2), Figure 7) up to the top of a vertical storage silo. Trucks are loaded under the storage silo by means of a clamshell that opens up, allowing hot mix asphalt in the storage silo to drop a short distance into the bed of the vehicle.

As cited earlier, equipment list & operational parameters of the plant is summarized in the following table. Additional related information which is provided by the manufacturer of the plant is provided (ADM Inc.) and IDEQ- PTC worksheets that are enclosed in Appendix (3) of this proposal.

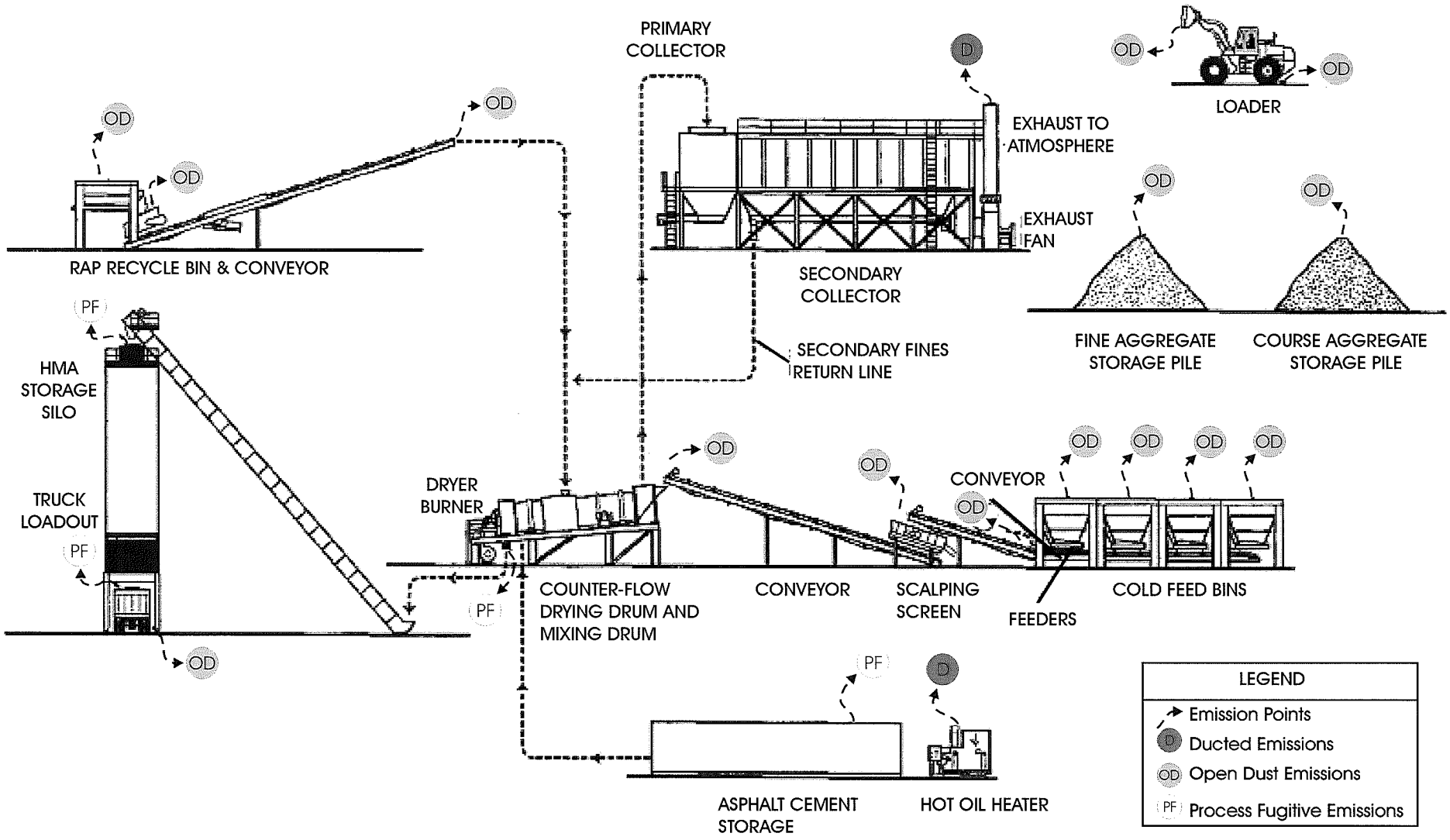
Table 3.1
Equipment List &Operational Parameters for the Proposed HMA*
ADM Inc., Manufacturer
Milemaker™ Series, Model MM225

Maximum Process Rate (throughput)	225 T/Hr
Proposed Process Rate (throughput)	225 T/Hr
Hours of Operation per year	1200 Hr
Maximum throughput at annual hours	270000 Ton
Maximum Heat Capacity	75000000 BTU
Emission Control Device(s)	Baghouse, Model BHP 585-9, Fabric Filter House, 99.5% efficiency
Aggregate Storage Bin(s)	Model 4CFB30 Cold Feed Bins
Conveyor(s)	Model WC3050 Weigh Conveyors 30" by 50 Ft.
HMA Storage	Two Silos Model HS-500S2 with total capacity of 500 ton
Associated equipment? Fuel tanks	Two above ground storage tanks, 44000 & 20000 G
Generator	None. Local power grid provides for electrical power
Dryer Stack Parameters: a) Type of fuel for Dryer Stack b) Dryer Stack Height c) Stack Diameter d) Exist Velocity e) Gas Exit Temperature	 Used Motor Oil, Estimated consumption 382.5 Gal/ Hr 6.797 Meter 0.9906 Meter 27.636 Meter/ second 421.8 Kelvin
Oil Tank Heater Parameters: a)Type of fuel for oil tank heater b) Stack Height c) Stack Diameter d) Tank Exit Velocity e) Tank Exit Temperature	 Diesel fuel #2, Estimated consumption 14.6 Gal/ Hr 2.7432 Meter 0.3048 Meter 6.1570 Meter/ second 591.3 Kelvin
Silo's Parameters: a) Height b) Width	 14.68 Meter 3.35 Meter

- The content of the table is intended to provide summary information for the purpose of point source emissions.

4. Process Flow Diagram

The 15-Day Pre-permit Construction Application requires a process flow diagram be provided for the IDEQ. A specific flow diagram is developed for this requirement and is represented in the following page of this proposal.



Process flow diagram for the Gordon Paving portable counter-flow drum mix asphalt plant

5. Emissions Inventory

IDEQ worksheets for PTC are utilized to estimate emissions from the proposed HMA. The worksheets calculate the emissions for the proposed HMA based on the type of equipment, operational parameters, type of fuel, fuel consumption and etc. Appendix (3) of this proposal includes all the completed and appropriate worksheets. A summary of the estimated emissions for the proposed HMA is presented below:

a) Emission estimates for the proposed HMA plant from the following sources were based on emission factors from AP-42 Section 11.1 and were based on operating 1200 hours per year at 225 tons per hour, and for a maximum annual throughput of 270,000 ton per year. It should be pointed out that it is projected that 10 hours per day will be the normal operation. However, due to unknown factors at this time, the plant may (at times) need to operate on a 24 hours per day at a total of 1200 hours/ year. That is why hours of operation in the IDEQ-B1 worksheet a 24 hours per day is entered as an input.

- HMA drum mix dryer
- Load-out, Silo filling and asphalt tank storage

b) Emission estimates for the proposed HMA plant for the following sources were based on emission factors from AP-42 Section 11.1(#2 fuel oil) and were based on operating 24 hours per day and a maximum of 4608 hours per year.

- Asphalt Tank Heater

A complete emission estimates for controlled and uncontrolled emissions of criteria and toxic air pollutants (TAPs) are also shown in Appendix (3) of this proposal.

It should be pointed out that AP-42 factors are not dependent on whether the drum mix plant is a parallel or counterflow design (the proposed HMA plant). Therefore, emission estimates in the Appendix (3) are valid for either type.

AP-42 Section 11.1.1.3 points out that a counterflow HMA plant can generally process RAP at ratios up to 50% with little or no observed effect upon emission. Consequently, it is requested to process RAP up to 50% in this proposal.

Table 5.1 represents the criteria air pollutant emissions from the proposed HMA, the asphalt tank heater, and from silo filling and load-out. PM emissions are also shown for the drum mixer dryer because the facility is subject to the New Source Performance Standard (NSPS) PM grain loading standard.

Emissions of the air toxics (TAPs) in total from the HMA, asphalt tank heater and from the load-out and silo fillings are represented in Table 5.2 (Following page). Selected Toxic Air Carcinogenic Pollutants are only listed. These values were determined based on the maximum operational parameters which were used as input in the IDEQ-worksheets. The values are compared to the emission screening levels of TAPs as cited in IDAP-586 table. It should be pointed out that 1200 hours per year is the maximum operation for drum dryer and a maximum 4608.0 hours per year is used for the

asphalt tank heater. Therefore, the TAPs exceeded the corresponding screening emission limits.

The asphalt tank heater and load-out & silo filling do not include any emission control equipment. However, the drum mix dryer is provided with a fabric filter baghouse which does not limit the emissions of the TAPs. These cited emissions (TAPs) are considered uncontrolled emissions.

Table 5.1
Emission Inventory Estimates- PM and Criteria Pollutants
Controlled Potential to Emit

Pollutant	Drum mix Dryer		Asphalt Tank Heater		Silo Filling & Load-Out	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
PM (total)	7.43	4.46	2.92E-02	6.73E-02	1.17E-01	7.05E-02
PM10 (total)	5.18	3.11	2.92E-02	6.73E-02	1.17E-01	7.05E-02
CO	29.25	17.55	7.30E-02	1.68E-01	3.04E-01	1.82E-01
NOx	12.38	7.43	2.92E-01	6.73E-01		
SO2	13.05	7.83	1.04	2.39E+00		
VOC	7.20	4.32	8.12E-03	1.87E-02	3.62E-02	2.17E-02
Lead	3.38E-03	2.03E-03	2.20E-05	5.08E-05		

Table 5.2

Pollutant	Drum mixer Dryer		Asphalt Tank Heater		Silo Filling & Load-Out		Total	Screening Emission Level
	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/hr
Non-PAH TAPs								
Benzene	8.78E-02	105.4	0.000000	N/A	1.36E-03	1.63E+00	8.91E-02	8.0E-04
Formaldehyde	6.98E-01	837.6	5.11E-05	2.35E-01	1.97E-02	2.36E+01	7.17E-01	5.10E-04
PAH TAPs								
Benzo(a)anthracene	4.73E-05		0.000000	N/A	4.66E-05	5.60E-02		----------
Benzo(a)pyrene	2.21E-05		0.000000	N/A	1.76E-06	2.11E-03	3.97E-06	3.0E-04
Benzo(b)fluoranthene	2.25E-05		1.46E-06	6.72E-03	5.83E-06	6.99E-03	2.98E-05	----------
Benzo(k)fluoranthene	9.23E-06		0.000000	N/A	1.69E-06	2.03E-03	1.09E-05	----------
Chrysene	4.05E-05		0.000000	N/A	1.99E-04	2.38E-01	2.39E-04	----------
Dibenzo(a,h)anthracene	0.000000		0.000000	N/A	2.84E-07	3.40E-04	2.84E-07	----------
Indo(1,2,3-cd)pyrene	1.58E-06		0.000000	N/A	3.61E-07	4.33E-04	1.94E-06	----------
Total PAHs (POM)	1.42E-04	0.1704	5.26E-05	2.42E-01	2.55E-04	3.06E-01	3.21E-04	2.60E-06
Metals								
Arsenic	1.26E-04	1.51E-01	1.93E-05	8.89E-02	0.000000	N/A	1.45E-04	1.5E-06
Cadmium	9.23E-05	1.10E-01	5.81E-06	2.68E-02	0.000000	N/A	9.81E-05	3.70E-06
Hexavalent Chromium	1.01E-04	1.21E-01	3.62E-06	1.67E-02	0.000000	N/A	1.05E-04	5.60E-07
Nickel	1.42E-02	17.04	1.23E-03	5.67E+00	0.000000	N/A	1.54E-02	2.70E-05

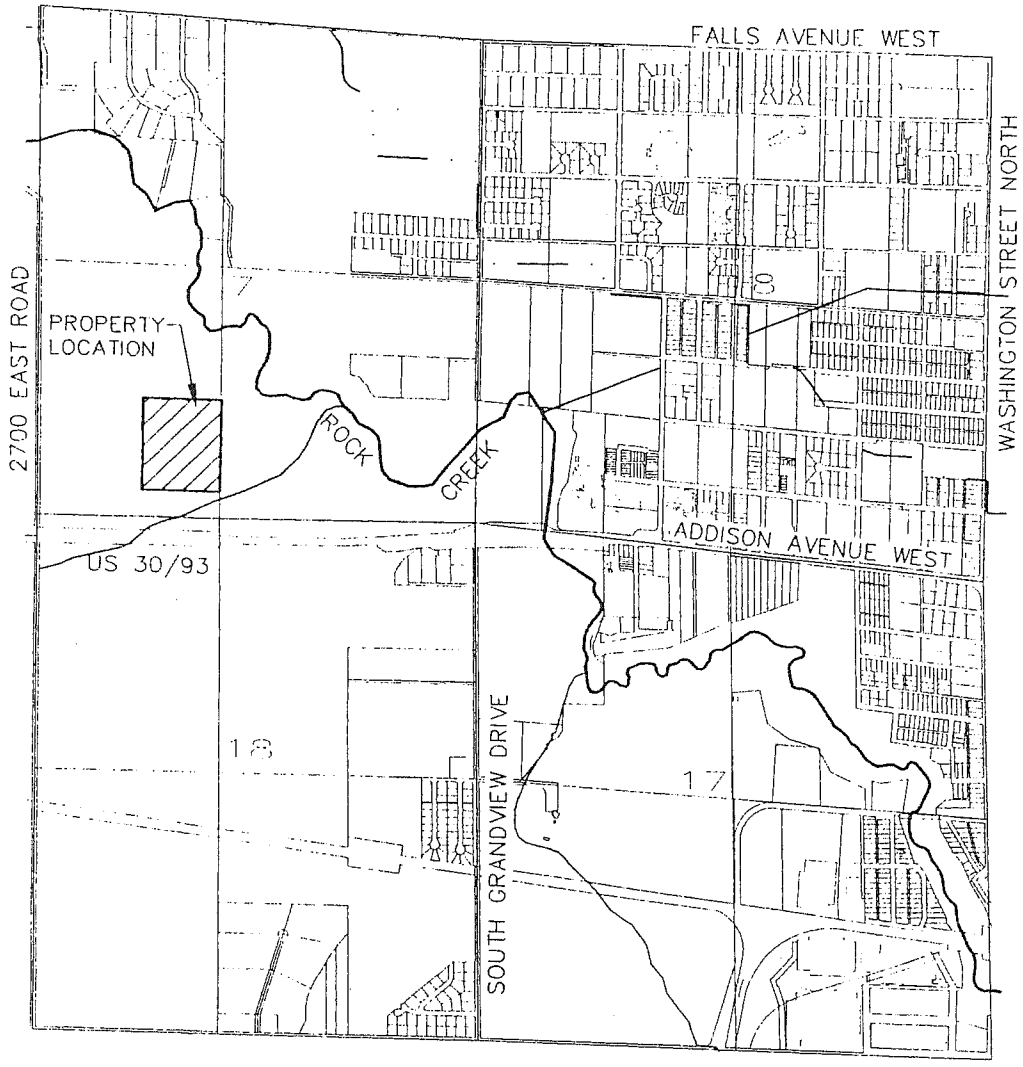
6. Modeling

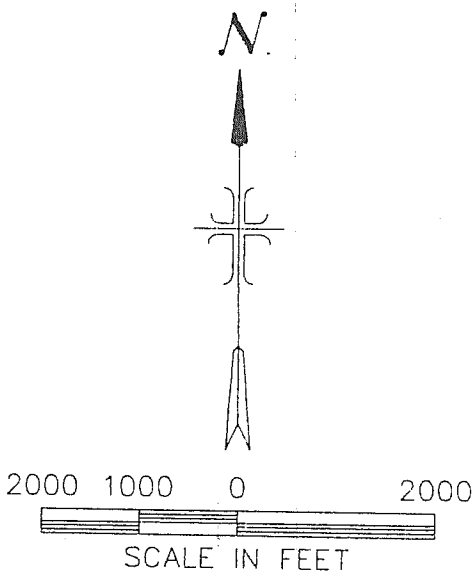
A dispersion model, Screen 3 Version dated 96043 was used to obtain pre-construction pollution impact(s) for the proposed plant. The preliminary modeling resulted in a setback distance of 150 meters. It was also concluded that a more refined modeling should be used to address this issue.
On March 24, a modeling protocol was provided to the IDEQ modeling coordinator, Mr. Kevin Schilling. On March 29, an approval was received along with comments. It was also concluded that a more refined modeling should be used to address this issue and the refined model will be performed by the IDEQ modeling staff. A copy of the modeling protocol and the protocol approval is represented in Appendix (3) of this proposal.

Appendix (1)

Maps:

1) Vicinity Map
2) Property Map
3) Building Locations
4) Scaled Plot





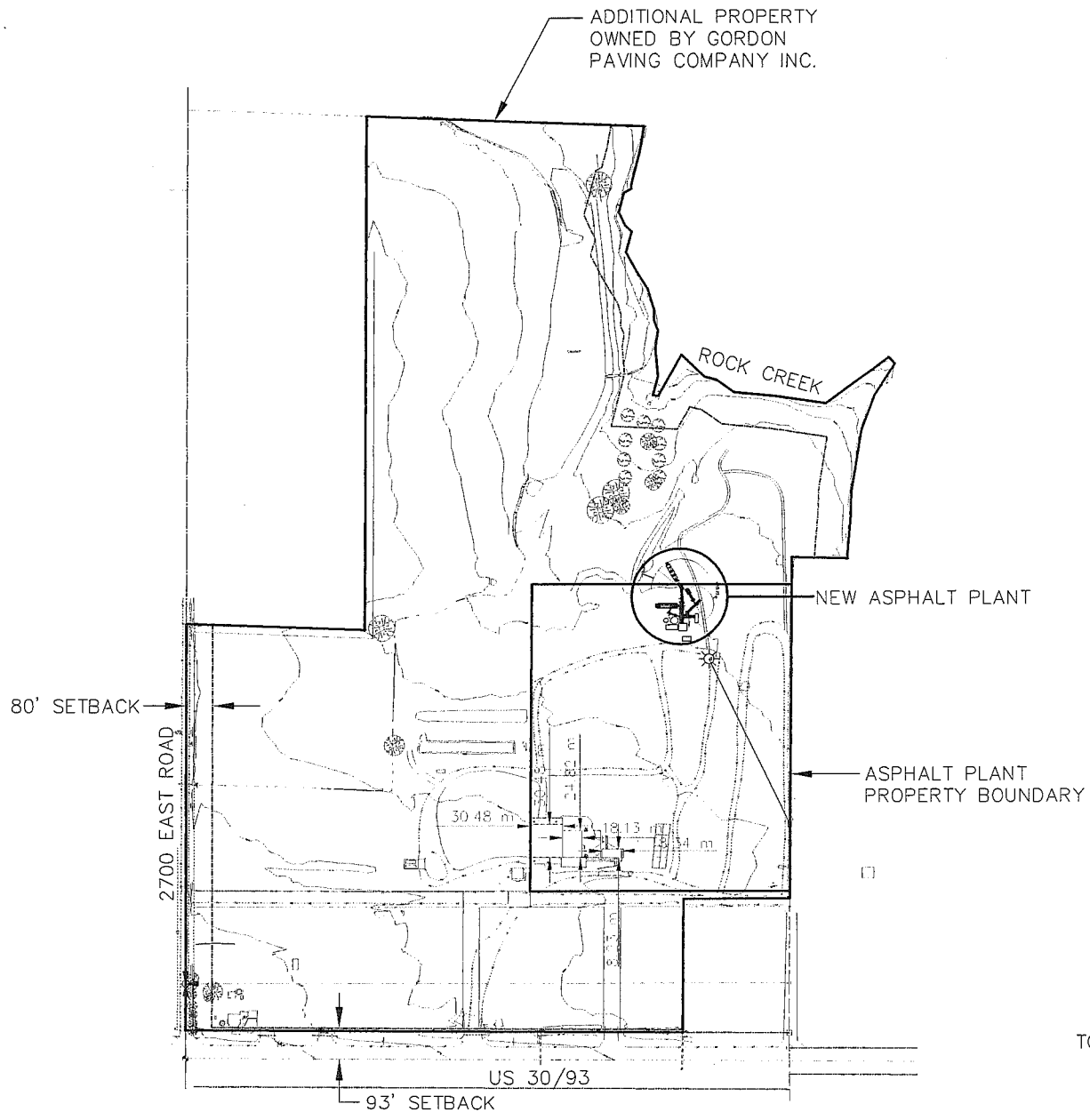
LAST UPDATE: 21 JUNE
PLOT DATE: 1-21-2008
FILE: 60.06 117ASP SUP

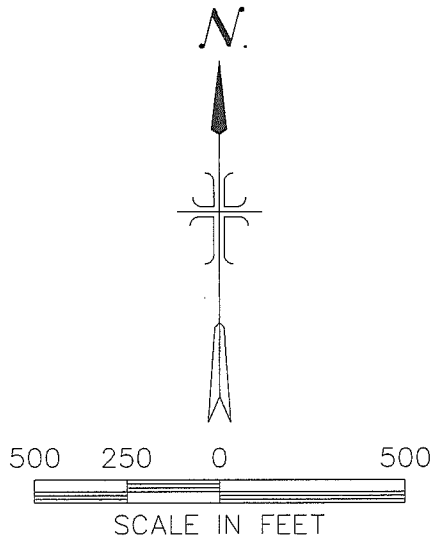
J-U-B

Engineers • Surveyors • Planners

GORDON PAVING
NEW ASPHALT PLANT

SPECIAL USE PERMIT
VICINITY MAP





OWNER

GORDON PAVING COMPANY INC.
837 MADRONA STREET SOUTH
TWIN FALLS, IDAHO 83301
PHONE: 208-733-1800

LEGAL DESCRIPTION

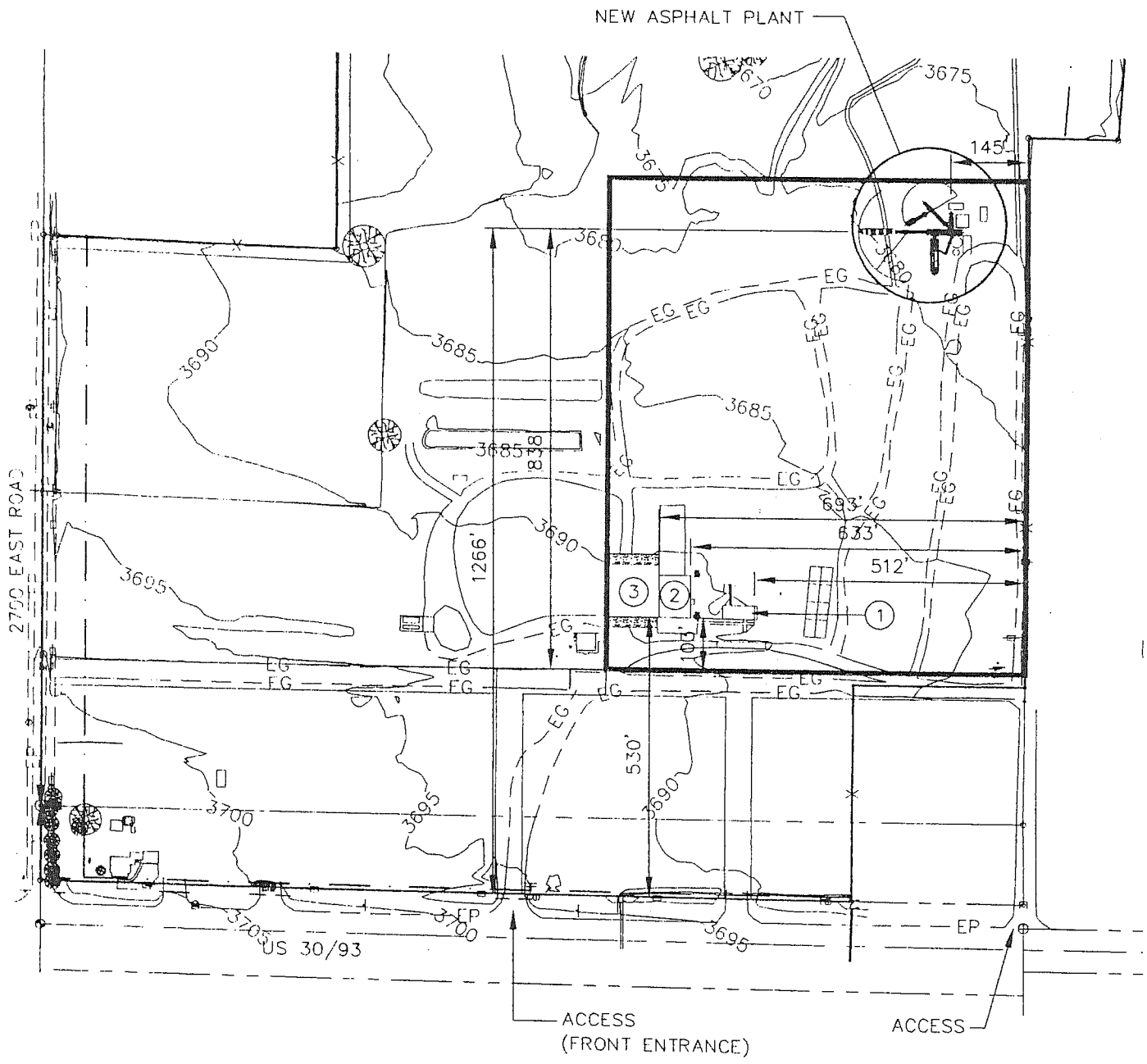
PART OF SECTION 7
TOWNSHIP 10 SOUTH, RANGE 17 E., BOISE MERIDIAN
TWIN FALLS COUNTY, IDAHO

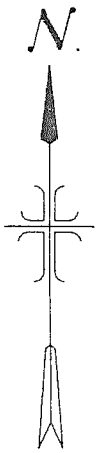
J·U·B
Engineers - Surveyors - Planners

LAST UPDATE: 4/1/2008
PLOT DATE: 4/1/2008
FILE: 60-06-117ASP SUP

GORDON PAVING
NEW ASPHALT PLANT

SPECIAL USE PERMIT
PROPERTY MAP





300 150 0 300

SCALE IN FEET

EXISTING BUILDINGS

1. OFFICE (26' X 61')
   1586 S.F.
2. SHOP (59' X 81')
   4779 S.F.
3. SHOP ADDITION (100' X 100')
   10,000 S.F.

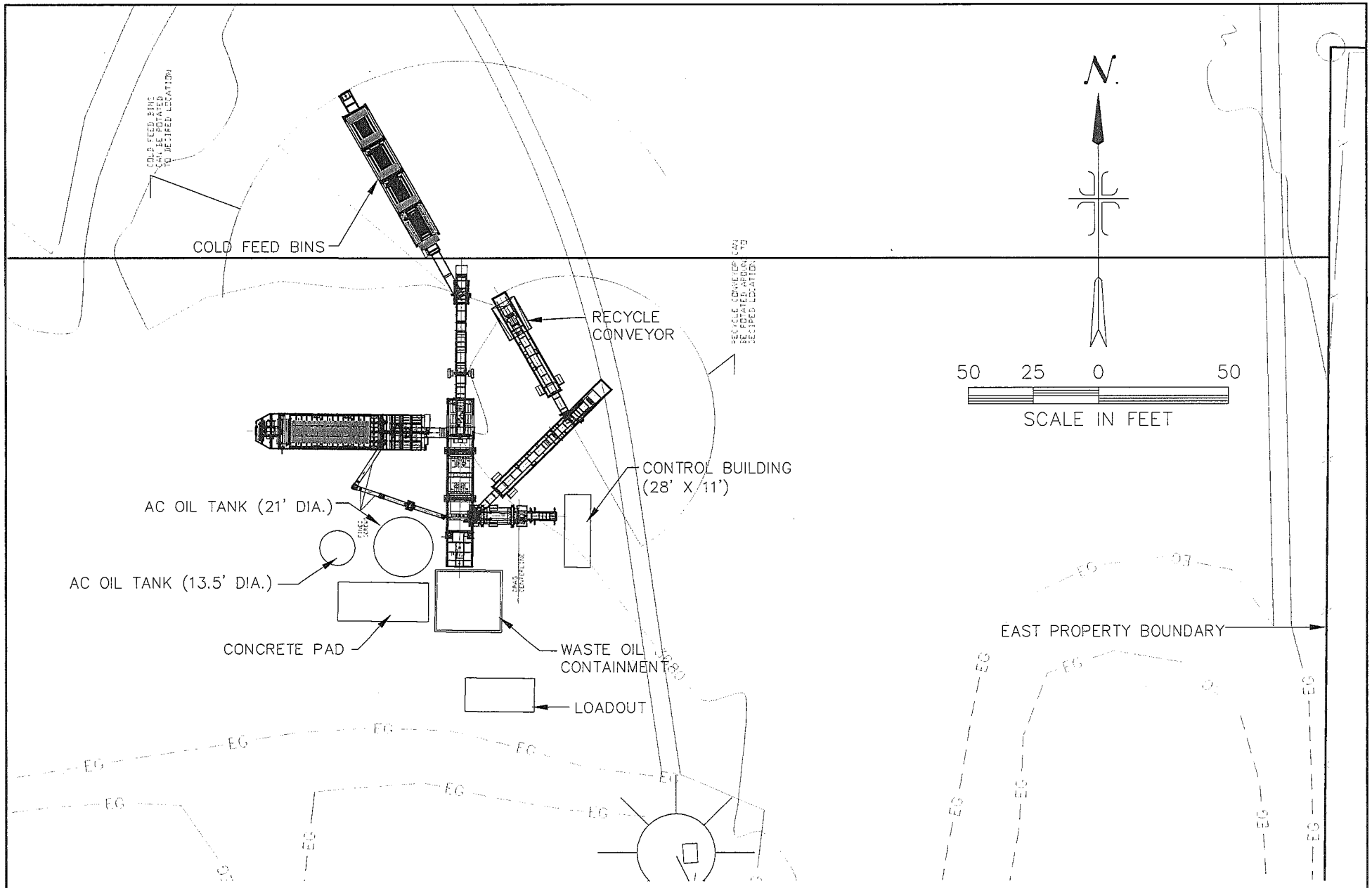
JUB

Engineers • Surveyors • Planners

LAST UPDATE: 21 2008
FILE: 60 06 1 "ASP SUP

GORDON PAVING
NEW ASPHALT PLANT

SPECIAL USE PERMIT
BUILDING LOCATIONS



J-U-B
Engineers • Surveyors • Planners

LAST UPDATE: 4/1/2008
PLOT DATE: 4/1/2008
FILE: 60-06-117ASP SUP

GORDON PAVING
NEW ASPHALT PLANT

SPECIAL USE PERMIT
NEW ASPHALT PLANT SITE

Appendix (2)

List of Figures:

Step-by-Step Process Description Figures (Figure 1-7)

Figure 1

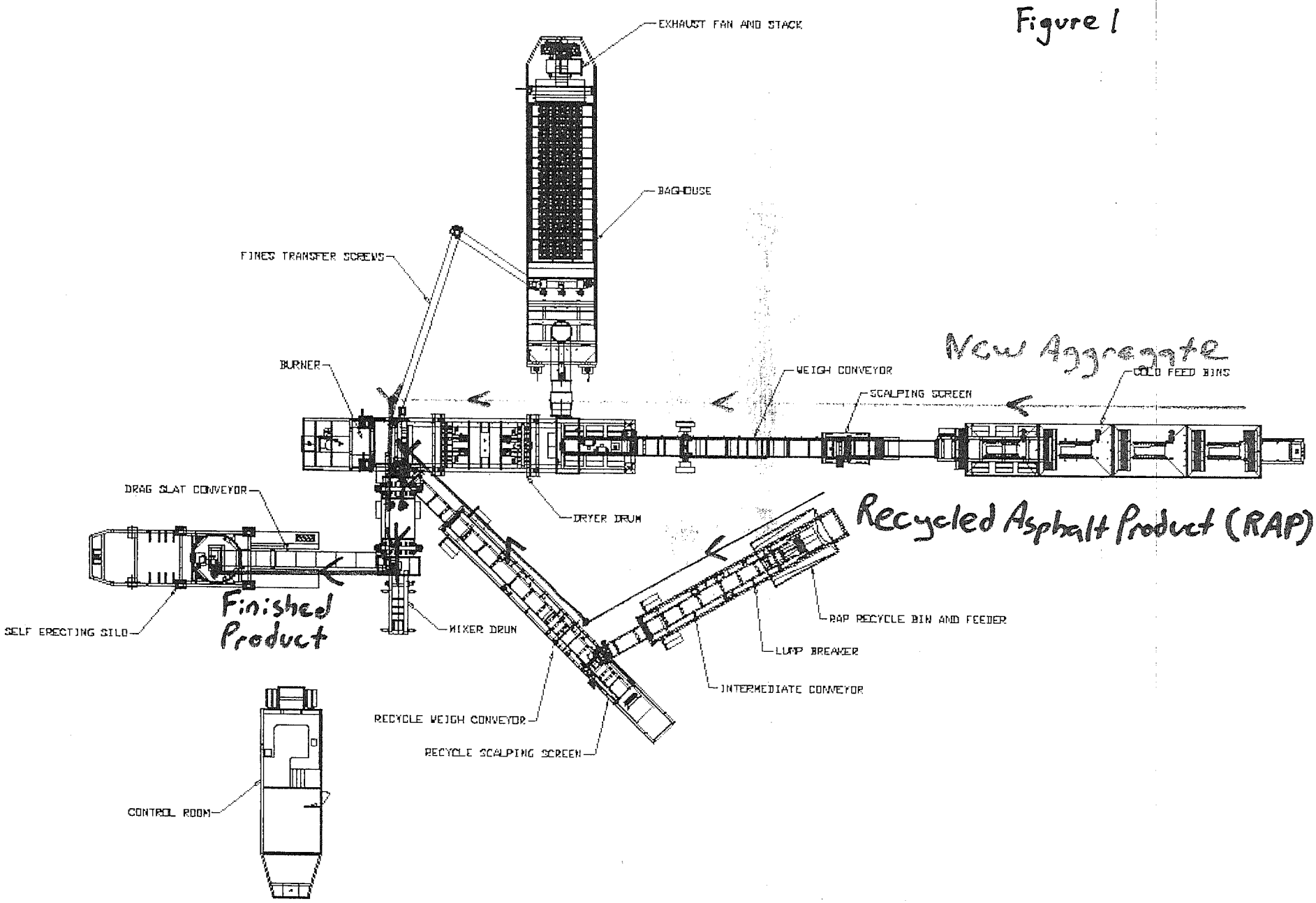

EXHAUST FAN AND STACK
BAGHOUSE
FINES TRANSFER SCREENS
BURNER
New Aggregate
WEIGH CONVEYOR
SCALPING SCREEN
COLD FEED BINS
DRAG SLAT CONVEYOR
DRYER DRUM
Recycled Asphalt Product (RAP)
Finished Product
SELF ERECTING SILO
MIXER DRUM
RAP RECYCLE BIN AND FEEDER
LUMP BREAKER
INTERMEDIATE CONVEYOR
RECYCLE WEIGH CONVEYOR
RECYCLE SCALPING SCREEN
CONTROL ROOM

Figure 2

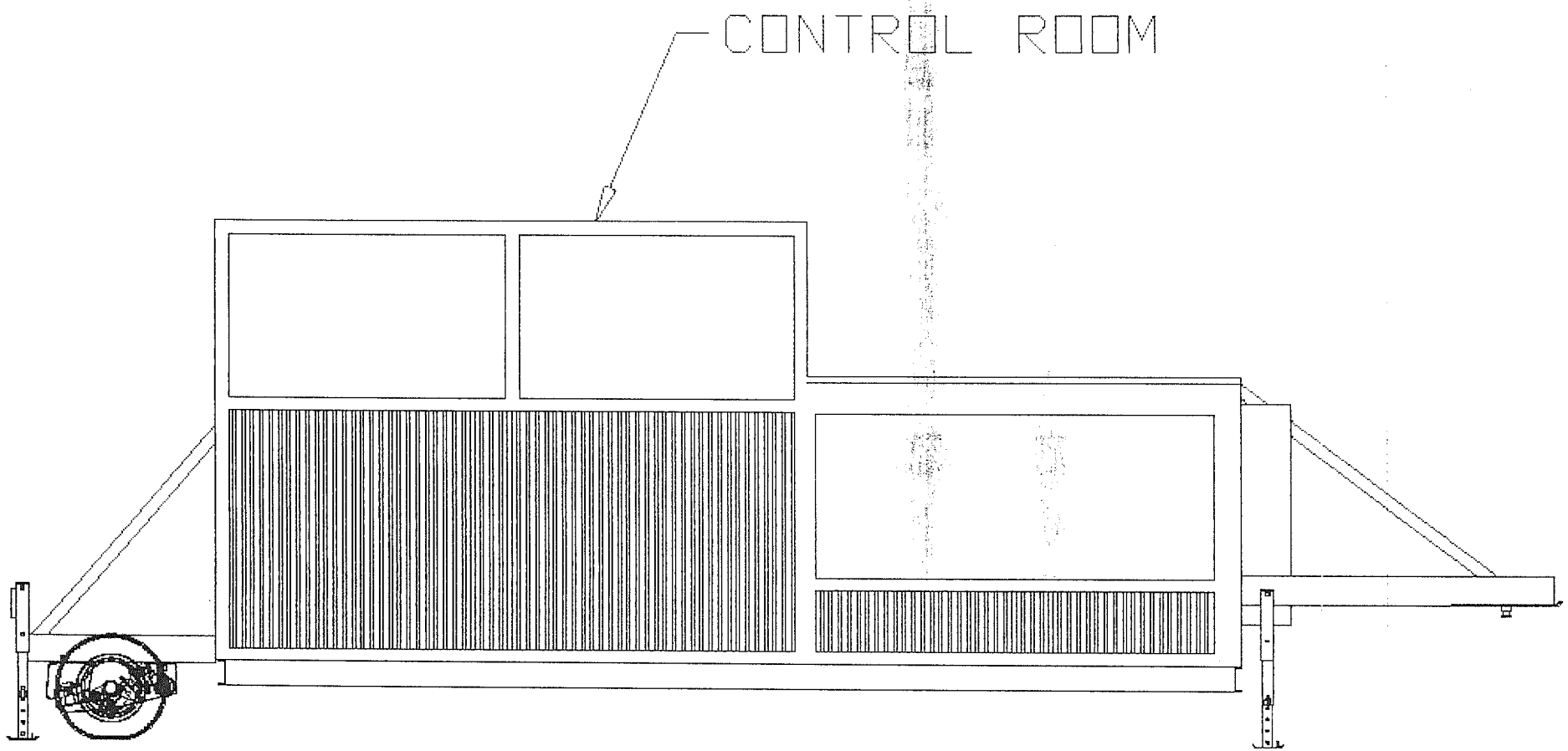


Figure 3

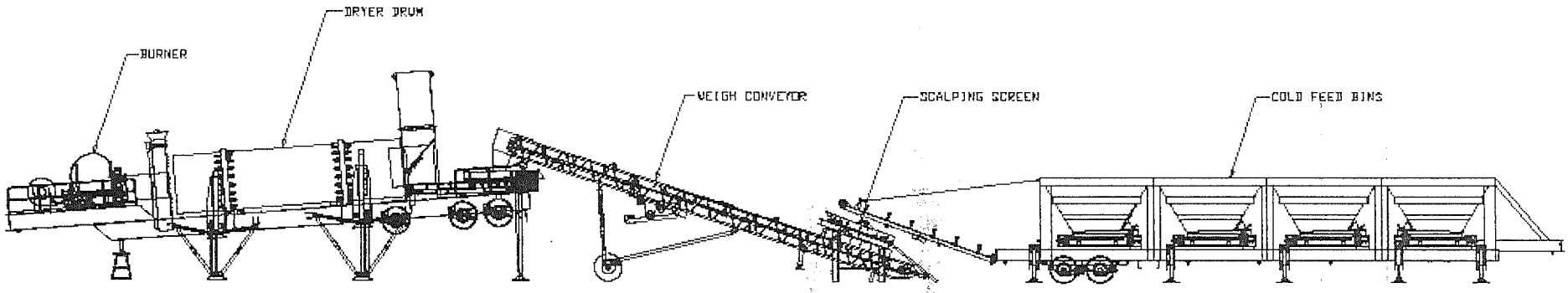

BURNER
DRYER DRUM
WEIGH CONVEYOR
SCALPING SCREEN
COLD FEED BINS

Figure 4

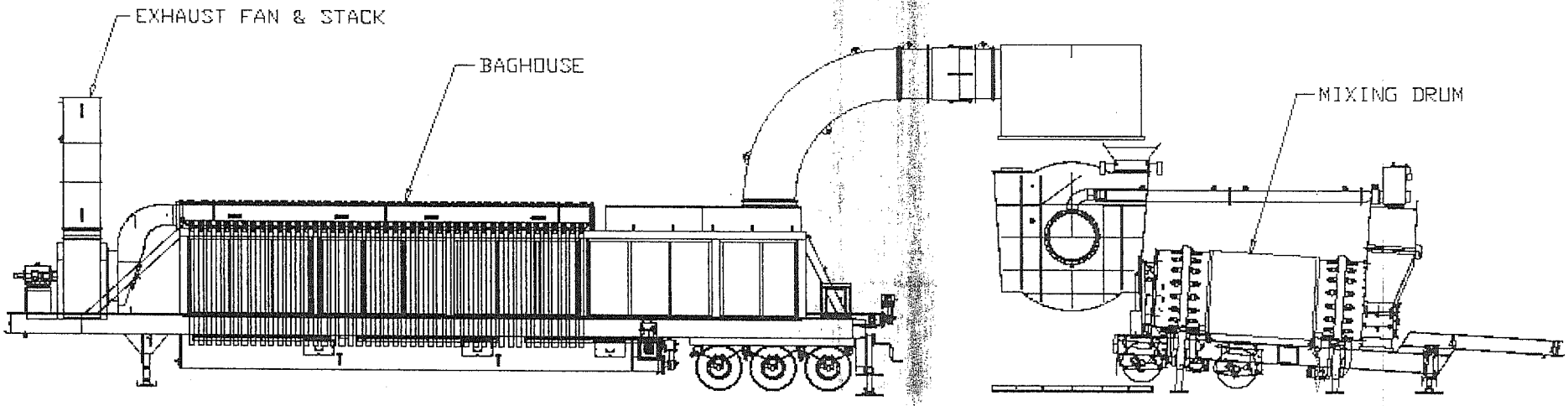


Figure 5

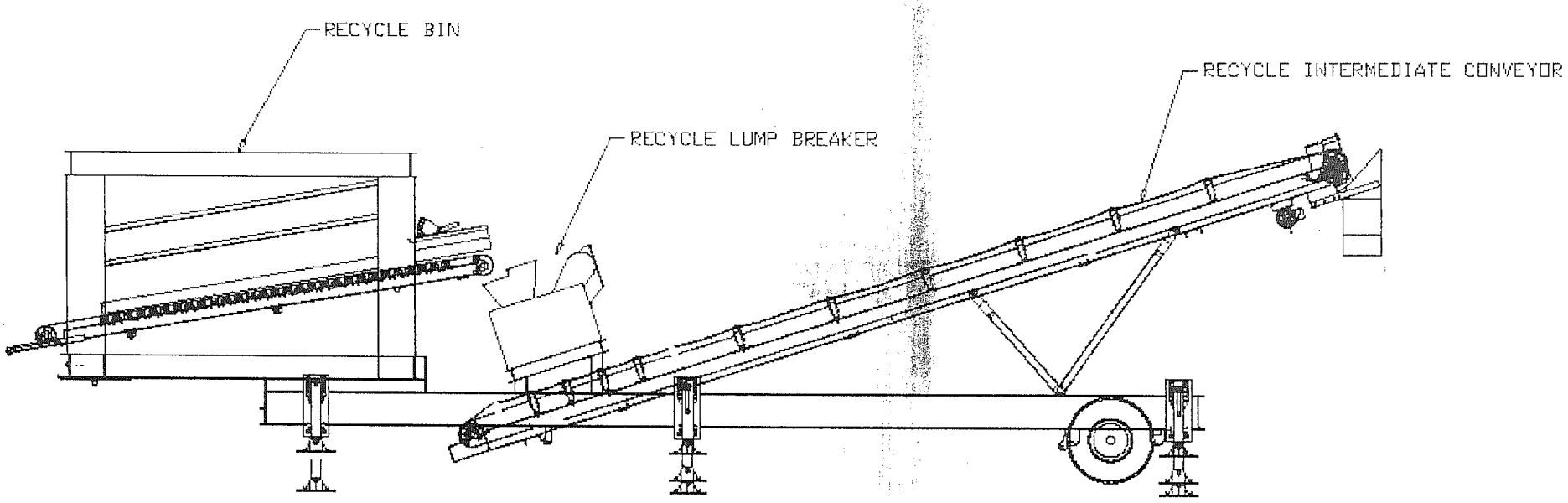

RECYCLE BIN
RECYCLE LUMP BREAKER
RECYCLE INTERMEDIATE CONVEYOR

Figure 6